



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

20 JUL 1993

Mr. Timothy Mach
Plant Manager
Aluminum Company of America
Massena Operations
P.O. Box 150
Massena, New York 13662

Re: ALCOA Secure Landfill Project

Dear Mr. Mach:

This is in response to the letter from Aluminum Company of America (ALCOA) to the United States Environmental Protection Agency (EPA), Region II dated September 18, 1992. In that letter, ALCOA requested EPA's approval under the Toxic Substances Control Act (TSCA) for the disposal of polychlorinated biphenyls (PCBs) in a secure landfill to be constructed on the ALCOA-Massena Operations real property in Massena, New York.

In EPA's letter to ALCOA dated March 24, 1993, EPA stated that its decision on ALCOA's application was subject to ALCOA's resolution of all concerns raised by the New York State Department of Environmental Conservation (NYSDEC), as well as any other concern raised by the public pursuant to a public information session to be held at the Massena Town Library on March 25, 1993.

On April 26, 1993, NYSDEC formally approved ALCOA's Secure Landfill Final Design Report and granted ALCOA permission to commence construction of the landfill, pending EPA's approval. In addition, EPA received no comments from the public regarding this matter. In consideration of the above and EPA's review of ALCOA'S application, EPA hereby finds ALCOA's TSCA application for the construction of the secure landfill (the Secure Landfill Final Design Report) acceptable.

ALCOA's application includes requests for two waivers from the technical requirements of 40 C.F.R. § 761.75(b). In accordance with 40 C.F.R. § 761.75 (c)(4), EPA is granting ALCOA's requests as follows:

40 C.F.R. § 761.75(b)(3) requires that the bottom of the landfill be at least 50 feet above the historical high water table.

Basis for waiver - ALCOA's application shows that the landfill liner system design meets or exceeds all federal minimum technology standards.

40 C.F.R. § 761.75(b)(6)(iii)(D) requires that all water samples be analyzed for chlorinated organics.

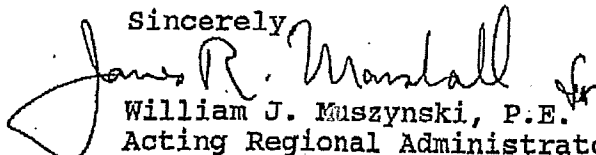
Basis for waiver - This is not a commercial landfill and analysis of water samples is specific to the wastes from the ALCOA site which will be placed in the landfill. ALCOA shall still comply with all the analysis requirements of § 761.75(b) which are not waived and with the requirements in the Records of Decision for the Site issued in May 1991, and January 1992.

EPA finds that waiving these two requirements will not present an unreasonable risk of injury to health or the environment.

Please note that EPA's approval at this time applies solely to the construction of the secure landfill. EPA's approval does not authorize the disposal of TSCA-regulated waste at the landfill. Following construction of each cell of the landfill to be used for the disposal of PCB waste, ALCOA is required to submit to EPA all construction certification documents, including as-built drawings and other relevant documents, for EPA's review and approval in accordance with 40 C.F.R. § 761.75(c).

Should you have any questions regarding EPA's approval procedure, please contact Mr. Adolph Everett, of my staff, at (212) 264-8690.

Sincerely,


William J. Muszynski, P.E.
Acting Regional Administrator

cc: Commissioner Thomas C. Jorling, New York State
Department of Environmental Conservation

Michael O'Toole, Jr., Division of Hazardous Waste
Remediation, New York State Department of Environmental
Conservation

Darrell Sweredoski, Division of Hazardous Waste Remediation,
New York State Department of Environmental Conservation
Region 6